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11 UNITED STATES DISTRICT COURT
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13 EASTERN DISTRICT OF CALIFORNIA
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15 UNITED STATES OF AMERICA,
16
17 Plaintiff,

18 vs.

19 DAVID KENNETH HANSEN,
20
21 Defendant.

Case No.: 2:20-cr-021 TLN

STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE
AND EXCLUDING TIME UNDER THE
SPEEDY TRIAL ACT

Date: May 14, 2020
Time: 9:30 a.m.
Court: Hon. Troy L. Nunley

22 Plaintiff United States of America by and through Assistant United States Attorney James
23 Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

- 24 1. This matter is presently set for an initial status conference on March 19, 2020. By
25 this stipulation, Defendant Hansen moves to continue the status conference to May
26 14, 2020.

27 ORDER CONTINUING STATUS
28 CONFERENCE

2. This case involves drug trafficking and firearm charges stemming from execution of search warrants in Sacramento and Placer Counties. Defendant appeared for arraignment on the charges contained in the Indictment on January 24, 2020.
3. The government has provided defense counsel with initial discovery consisting of written offense reports and audio recordings. Defense counsel is reviewing these materials with Mr. Hansen and conducting investigation into potential defenses. The defense therefore requests additional time to conduct its discovery review and investigation.
4. Given the ongoing defense investigation, Defendant Hansen requests to continue the status conference in this matter to May 14, 2020, at 9:30 a.m., and to exclude time between March 19, 2020 and May 14, 2020, inclusive, under Local Code T-4. The United States does not oppose this request.
5. Attorney Todd Leras represents and believes that failure to grant additional time as requested would deny Defendant Hansen the reasonable time necessary for effective preparation, considering the exercise of due diligence.
6. Based on the above-stated facts, Defendant Hansen requests that the Court find that the ends of justice served by continuing the case as requested outweigh the best interest of the public and the Defendant in a trial within the time prescribed by the Speedy Trial Act.
7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of March 19, 2020 to May 14, 2020, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and

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1 (B) (iv) [Local Code T-4] because it results from a continuance granted by the Court
2 at Defendant Hansen's request on the basis that the ends of justice served by taking
3 such action outweigh the best interest of the public and the Defendant in a speedy
4 trial.
5

6 8. Nothing in this stipulation and order shall preclude a finding that other provisions of
7 the Speedy Trial Act dictate that additional time periods are excludable from the
8 period within which a trial must commence.

9 Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized
10 Todd Leras via email to sign it on his behalf.
11

12 DATED: March 17, 2020

13 By /s/ Todd D. Leras for
14 JAMES CONOLLY
Assistant United States Attorney

15 DATED: March 17, 2020

16 By /s/ Todd D. Leras
17 TODD D. LERAS
Attorney for Defendant
18 DAVID HANSEN
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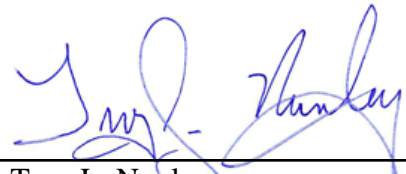
28 ORDER CONTINUING STATUS
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1 **ORDER**

2 BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is
3 hereby ordered that the status conference in this matter, scheduled for March 19, 2020, is
4 vacated. A new status conference is scheduled for May 14, 2020, at 9:30 a.m. The Court further
5 finds, based on the representations of the parties and Defendant Hansen's request, that the ends
6 of justice served by granting the continuance outweigh the best interests of the public and the
7 Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. §
8 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into
9 consideration the exercise of due diligence for the period from March 19, 2020, up to and
10 including May 14, 2020.
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13 IT IS SO ORDERED.

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15 DATED: March 17, 2020

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17 _____
18 Troy L. Nunley
19 United States District Judge
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CONFERENCE